

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

KATHLEEN MILLER,

Plaintiff

v.

Civil Action No.: 05-30117-KPN

VERIZON COMMUNICATIONS, INC.,

Defendant

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME TO OPPOSE  
PLAINTIFF'S MOTION TO COMPEL**

Defendant hereby moves for a one-day extension of time to file an opposition to the Plaintiff's Motion to Compel, which is currently due on March 24, 2006. In support of this Motion, the Defendant states the following:

1. Plaintiff filed a Motion to Compel on March 10, 2006, making the opposition due on March 24, 2006.
2. Due to the illness of Defendant's counsel, the opposition is not yet complete. Verizon's counsel conferred with Plaintiff's counsel on March 24, 2006 to seek a one-day extension of time to oppose the Motion to Compel. Plaintiff's counsel does not oppose the extension.
3. The requested extension is brief and for good reason, and will not interfere with the Scheduling Order in this case. In light of the Plaintiff's counsel's assent, the Plaintiff will not be prejudiced as a result.

WHEREFORE, the Defendant requests the Court grant the extension requested, and permit the Defendant to file an opposition to the Plaintiff's Motion to Compel on March 27, 2006.

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VERIZON COMMUNICATIONS, INC.,

By its attorneys,

\_\_\_\_\_/s/ Windy L. Rosebush\_\_\_\_\_  
Timothy P. Van Dyck, (BBO #548347)  
Windy L. Rosebush, (BBO #636962)  
EDWARDS ANGELL PALMER &  
DODGE LLP  
111 Huntington Avenue  
Boston, MA 02199

**CERTIFICATE OF SERVICE**

I, Windy L. Rosebush, hereby certify that on March 24, 2006, I caused a copy of the foregoing document to be served on Michael O. Shea, Esq., 451 Main Street, Wilbraham, MA 01095 by filing the same electronically.

\_\_\_\_\_/s/ Windy L. Rosebush\_\_\_\_\_